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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8330

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Angelica SAINZ-Lopez

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF


21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)

The undersigned complainant being duly sworn states:

That on or about April 17, 2008, within the Southern District of California, defendant Angelica SAINZ-Lopez did knowingly and intentionally import approximately 32.92 kilograms (72.42 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
BRANDON M. WOOD  
Special Agent  
U.S. Immigration & Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 18th,  
DAY OF APRIL 2008.

  
PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Angelica SAINZ-Lopez

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes  
6 furnished to U. S. Immigration and Customs Enforcement Special Agent Brandon  
7 Wood.

8 On April 17, 2008, at approximately 1311 hours, Angelica SAINZ-Lopez entered  
9 the United States at the Calexico, California East Port of Entry (POE). SAINZ was the  
10 driver, registered owner, and occupant of a 2002 Dodge Dakota with Mexican license  
11 plate number BM69111. SAINZ was accompanied by her minor daughter.

12 Customs and Border Protection Officer (CBPO) E. Bosquet was manning  
13 primary lane three when Angelica SAINZ-Lopez applied for entry into the United States  
14 driving a 2002 Dodge Dakota. SAINZ presented CBPO E. Bosquet with a valid DSP-  
15 150. SAINZ's presented a valid DSP-150 for her daughter to CBPO E. Bosquet. While  
16 conducting an inspection of the vehicle, CBPO E. Bosquet noticed a black spray like  
17 paint near the rear driver's side tire. CBPO E. Bosquet tapped the gas tank and noticed  
18 that it felt solid. CBPO E. Bosquet escorted SAINZ, her daughter and the vehicle to the  
19 vehicle secondary lot for a more intensive inspection of the vehicle.

20 During the secondary inspection, CBPO E. Bosquet asked Customs and Border  
21 Protection Canine Officer (CEO) I. Cuen to utilize his Human Narcotics Detector Dog  
22 (HNDD) on the vehicle. CEO I. Cuen's HNDD alerted to the interior of the vehicle.  
23 CEO I. Cuen notified CBPO E. Bosquet of the alert.

24 CBPO E. Bosquet drove the vehicle to the vehicle x-ray machine where operator  
25 CBPO S. Apolinar informed CBPO E. Bosquet that the vehicle had anomalies within the  
26 gas tank. The gas tank was removed and opened, and CBPO E. Bosquet was able to  
27 see several packages. One of the packages was probed and produced a green, leafy  
28 substance that field tested positive for marijuana.  
29

1 A total of thirty one (31) packages were retrieved from the gas tank with a total  
2 weight of 32.92 kilograms (72.42 pounds).

3 Special Agent (SA) Brandon Wood placed SAINZ under arrest for violation of  
4 Title 21 United States Code 952 and 960, Importation of a Controlled Substance.  
5 SAINZ was advised of her Constitutional Rights, per Miranda, which she acknowledged  
6 and waived.

7 SAINZ admitted knowledge that a controlled substance was concealed within the  
8 vehicle. SAINZ stated to SA Wood that the smuggling organization was going to pay  
9 her \$2500.00 to smuggle the controlled substance into the United States and drop it off  
10 at a "Days Inn" motel in Perris, California. SAINZ was processed, booked, and  
11 transported to Imperial County Jail.